

PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 07/2021)

United States Courts  
Southern District of Texas  
FILEDIN THE UNITED STATES DISTRICT COURT  
FOR THE Southern DISTRICT OF TEXAS  
DIVISION

APR 4 2022

Nathan Ochsner, Clerk of Court

Prince  
William Christopher Joseph Donum J.R.P.C III  
Plaintiff's Name and ID Number811 E. Concho ARANSAS County (Unit 1) Detention Center  
Place of Confinement

CASE NO.

(Clerk will assign the number)

v.

ARANSAS County Public Safety Center (R.PPD/ACSD) 714 E. Concho Street Rockport, Texas  
Defendant's Name and Address (Apprro - (do Employees)ARANSAS/SAN PAT County/DISTRICT COURTS CIVIL EMPLOYEES/Judges (33 Employees)  
Defendant's Name and Address

FED Hwy 35 North Rockport Texas

ARANSAS County Detention Center 811 E. Concho Street Rockport Texas 78382  
Defendant's Name and Address  
(DO NOT USE "ET AL.")

## INSTRUCTIONS - READ CAREFULLY

## NOTICE:

Your complaint is subject to dismissal unless it conforms to these instructions and this form.

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE. ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

## FILING FEE AND *IN FORMA PAUPERIS* (IFP)

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$52.00 for a total fee of **\$402.00**.
2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at your prison unit.
3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from your inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$52.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)
4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

## CHANGE OF ADDRESS

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "**NOTICE TO THE COURT OF CHANGE OF ADDRESS**" and shall not include any motion for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

### I. PREVIOUS LAWSUITS:

A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment?  YES  NO

B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)

1. Approximate date of filing lawsuit: 03-03-20

2. Parties to previous lawsuit:

Plaintiff(s) Christopher Joseph Dawnun

Defendant(s) Bellmills A Choppa, Patrick Hansen, Jason Whitley

3. Court: (If federal, name the district; if state, name the county.) 3 Southern District U.S. Court

4. Cause number: 1

5. Name of judge to whom case was assigned: R

6. Disposition: (Was the case dismissed, appealed, still pending?) Voluntarily Dismissed due to his death

7. Approximate date of disposition: June 2020

SHSS  
~~SHSS~~ LSC

II. PLACE OF PRESENT CONFINEMENT: ARANSAS County Detention Center

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure?  YES  NO

Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: ARANSAS County, City of Rockport Rockport Police Dept, ARANSAS County Sheriff's Department ARANSAS County Federal Detention Center SAN PATRICIO Sheriff's ARANSAS PASS Police Department (AND RETAILERS/merchants)

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: BT/11 MTHS [ARANSAS County SHERIFF] ARANSAS County Public Safety Center 714 E. Concho STREET Rockport Texas 78382

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Engage in ORGANIZED CRIME by MEANS OF DOMESTIC TERRORISM (1)

Defendant #2: John Gutierrez ARANSAS County Sheriff's Deputy 714 E. Concho STREET Deputy Chief - APPEAL OFFICER

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Engaged in ORGANIZED CRIMINAL ACT of A TERRORISTIC NATURE

Defendant #3: MATT MURPHEY (Former) ARANSAS County Sheriff's Deputy 714 E. Concho ST Rockport Texas

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

PLANTING Evidence - Engaging in ORGANIZED CRIME of TERRORISTIC NATURE

Defendant #4: ARMONDO CHAPPA (Chief SATLER) 811 E. Concho ACDC ARANSAS County Sheriff's Dept Rockport TX 78382

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

Rape, MURDER, Drug DISTRIBUTION, PROSTITUTION <sup>to</sup> RICO.

Defendant #5: DAVID KLANIKA - 811 E. Concho (RUSSIAN) ESPIONAGE ACDC Rockport Texas

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

ELECTRONIC CRIMES - Evidence, IMPERSONATION, OBSTRUCTION of

JUSTICE Theft of SOFTWARE, Identity, Communications disruption

High Ranking Member in ORGANIZED CRIMINAL ACTIVITIES of DOMESTIC TERRORIST NATURE <sup>3</sup>

V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

PARTIES of multiple Agencies Municipalities, And JUDICIAL members in Excess of over 200 member ACTING IN AN ORGANIZED CRIMINAL Co ConSPIRATIal DOMESTIC TERRORIST:C manner while under A CIVIL BANNER PerpreTRATING CRIMES for profit Abusing, PUBLIC OFFICE- police, Sheriffs, Judges, Court Employees TEXAS LAWYERS - FAISE ARREST, WRONGFUL PROSECUTION, ENTRAPMENT / FRAMING - Abuse of Authority - Identity Theft, Impersonation MURDER, Fema/Government Fraud, TRUST FUND THEFT DEFRAUDING CHARITABLE ORGANIZATIONS

VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I pray for RELIEF in The The Following, CRIMINAL CHARGES , Employment LIFT TIME BAN, ACCESS MONATARY VALUE and SIEZE Their HOLDING TOWARDS REPARATIONS from PERSONAL ASSETS

VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

William Christopher Joseph Downing EVANS WORTHINGTON Deeds or me as Alexander Roberts Smith PENTLAND JR  
Billy Anderson Joseph Michael CRISTI ANGEL READER - PAM Anderson - Michael Angel Precious, DANGAL MANNES MANNES or me

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

AS IS Expected Every EFFort To gAIN documentation HAS met with  
obSTructiOn on every level

VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? YES  NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): \_\_\_\_\_

2. Case number: \_\_\_\_\_

3. Approximate date sanctions were imposed: \_\_\_\_\_

4. Have the sanctions been lifted or otherwise satisfied? YES  NO

C. Has any court ever warned or notified you that sanctions could be imposed?  YES  NO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): \_\_\_\_\_
2. Case number: \_\_\_\_\_
3. Approximate date warning was issued: \_\_\_\_\_

Executed on: 03-30-2022  
DATE

TXDL  
Dob  
SS# 9929

CHRISTOPHER JOSEPH Downum

Christopher Joseph Downum  
(Signature of Plaintiff)

#### PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *informa pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this ThirtYeth (30) day of MARCH (3RD), 20 22 (mmxxii)  
(Day) (month) (year)

TXDL  
Dob 1969  
SS# 9929

PRINCE

CHRISTOPHER Joseph Downum

PRINCE

Christopher Joseph Downum  
(Signature of Plaintiff)

**WARNING:** Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.

b. Title of the suit: Downum vs 36<sup>th</sup> DISTRICT Court, City of Rockport And others

c. Case number and date suit was filed: Had To VolenTARILY DISMISS Due To intentional  
HenderFANCE by ACDC JAIL STAFF.

d. If you are not a party to this suit, what is your connection with it? Explain briefly.

DISMISSED Due To ACDC STAFF And Courts Denying Access To  
PERSONAL information Then Transfer w/o CAUSE To Hinder Compliance

If you have copies of court documents, please attach.

3. Explain in detail why you think this attorney has done something improper or has failed to do something which should have been done. Attach additional sheets of paper if necessary.

Supporting documents, such as copies of a retainer agreement, proof of payment, correspondence between you and your attorney, the case name and number if a specific case is involved, and copies of papers filed in connection with the case, may be useful to our investigation. Do not send originals, as they will not be returned. Additionally, please do not use staples, post-it notes, or binding. Please limit your supporting documentation to 25 pages. Information, including audio, video or image files, submitted on a USB thumb drive or flash drive must not exceed 25MB. Information received after the 10 day deadline will be returned and not considered, as well as information submitted on CDs, DVDs, cassette tapes or other unsupported media.

Include the names, addresses, and telephone number of all persons who know something about your grievance.

Please be advised that a copy of your grievance will be forwarded to the attorney named in your grievance. To protect your privacy and the privacy of others, please redact personal identifying information (i.e., social security number, date of birth) from any document you provide in support of your grievance and avoid submitting medical records or protected health information belonging to third-parties. Please be advised that in the event that you do provide records that contain your own personal identifying information or protected health information, you are authorizing us to share this information with the attorney named in your grievance. Be advised that documents that contain unredacted third party personal identifying information or that individual's protected health information will be returned and not considered. By executing the grievance below, you authorize the CDC to disclose your personal identifying information and protected health information as necessary to comply with the law, or as necessary to carry out the function and duties of the CDC.

DEFENDANT #6 VANDE MENDER

BRIEFLY DESCRIBE ACT THAT HARMED YOU.

DEFENDANT #7 Bellmonia

BRIEFLY DESCRIBE ACTS.

DEFENDANT #8 HECTER MARTINEZ

BRIEFLY DESCRIBE ACTS.

DEFENDANT #9 CROW

BRIEFLY DESCRIBE ACTS.

DEFENDANT #10 KAREN ALVAREZ

BRIEFLY DESCRIBE ACTS Torres

DEFENDANT #11 Torres

BRIEFLY DESCRIBE ACT.

DEFENDANT #12 Torres

BRIEFLY DESCRIBE ACTS

DEFENDANT #13 Tobar

BRIEFLY DESCRIBE ACT

DEFENDANT #14 DRIEKORN

BRIEFLY DESCRIBE ACTS

DEFENDANT #15 UVALIE

BRIEFLY DESCRIBE ACTS

DEFENDANTS #16 MADDOX

BRIEFLY DESCRIBE ACTS

DEFENDANT #17 WALKER

BRIEFLY DESCRIBE ACTS

DEFENDANT DUGARD

DESCRIBE ACTS

DEFENDANT #19 FINCHER

DESCRIBE ACTS #2

DEFENDANT #20 GONZALES

DESCRIBE ACTS

DEFENDANT #21 APPEL

DESCRIBE ACTS

DEFENDANT #22 BAKER

DESCRIBE ACT

DEFENDANT #23 GARRADO

DESCRIBE ACTS

DEFENDANT #24 MENDOTTA

DESCRIBE ACT ROMAN COFFEE

DEFENDANT #25 Roman Carter

DESCRIBE ACTS

DEFENDANT #26 Peabody

DESCRIBE ACTS

DEFENDANT #27 Gynn

DESCRIBE ACTS

DEFENDANT #28 Rose Lopez

DESCRIBE ACTS

DEFENDANT #29 Garcia

DESCRIBE ACTS

DEFENDANT #30 Snow

DESCRIBE ACTS

DEFENDANT #31

DOAN

BRIEFLY DESCRIBE ACTS

DEFENDANTS

ARDNT

DESCRIBE ACTS

DEFENDANT #33

ANDRETTI

DESCRIBE ACTS

#34

DEFENDANT

ISBella manose

DESCRIBE ACTS

# 35

DEFENDANTS

MARKOS MORENO

DESCRIBE ACTS

#36

DEFENDANT

Nochale DeLean

DESCRIBE ACTS

DEFENDANT

#37  
ROBERT

WRONGFUL PROSECUTION

DESCRIBE ACTS JURY TRAINING AND MANIPULATION ENGAGING IN ORG CRIME OF TERRORISTIC STYLE ATTEMPTED CAPITAL MURDER - BRIBERY - INFLUENCE

#38

DEFENDANT Kelsey Downing EX ASIS DA 35 DISTRICT COURT RP TO 2840 Hwy 35 north

DESCRIBE ACTS ENGAGING IN ORG CRIME - FABRICATION - EVIDENCE TAMPERING VIOLATION OF DISCOVERY - VIOLATION OF BRADY - FALSE INVESTIGATION JURY MANIPULATION

#39

DEFENDANT JACQUELYN JOHNSON, 36 DISTRICT ADA [MAY 22-2021]

DESCRIBE ACTS FABRICATED DOCUMENTS (CAPTAINS WARRANT MAY 22-2021)

FALSE INDICTMENT, JURY MANIPULATION, WRONGFUL PROSECUTION (RICO)

#40

DEFENDANT AMANDA OSTER 36TH DISTRICT DA

DESCRIBE ACTS JOEL B JOHNSON FABRICATION EVIDENCE TO FALSE

INDICTMENT, FALSE IMPRISONMENT - JURY MANIPULATION (RICO)

#41

DEFENDANT JOEL B JOHNSON 36<sup>th</sup> AND 343 SINTON VISITING

DESCRIBE ACTS FABRICATION INTENTIONAL ERONEOUS RULING - KIDNAPPING ABDUCTION (RICO) I.E. ENGAGING IN ORGANIZED TERRORISTIC CRIMES

#42 DEFENDANT

COLTYN BARRETTE Rockport Police - Retired ATTEMPTED MURDER - ASSAULT BRASS KNICKERS - HELD TASER TO FACE

DESCRIBE ACTS SOCIAL TERRORISM THEFT ATTEMPTED MURDER THEFT (RICO)

#43

DEFENDANT Deputy BARRETTE SAN PATRICIO County Sheriff

DESCRIBE HOW IT FAILED TO PERFORM DUTIES ~~1~~ ~~2~~ ~~3~~ ~~4~~ ~~5~~ ~~6~~ ~~7~~ ~~8~~ ~~9~~ ~~10~~ ~~11~~ ~~12~~ ~~13~~ ~~14~~ ~~15~~ ~~16~~ ~~17~~ ~~18~~ ~~19~~ ~~20~~ ~~21~~ ~~22~~ ~~23~~ ~~24~~ ~~25~~ ~~26~~ ~~27~~ ~~28~~ ~~29~~ ~~30~~ ~~31~~ ~~32~~ ~~33~~ ~~34~~ ~~35~~ ~~36~~ ~~37~~ ~~38~~ ~~39~~ ~~40~~ ~~41~~ ~~42~~ ~~43~~ ~~44~~ ~~45~~ ~~46~~ ~~47~~ ~~48~~ ~~49~~ ~~50~~ ~~51~~ ~~52~~ ~~53~~ ~~54~~ ~~55~~ ~~56~~ ~~57~~ ~~58~~ ~~59~~ ~~60~~ ~~61~~ ~~62~~ ~~63~~ ~~64~~ ~~65~~ ~~66~~ ~~67~~ ~~68~~ ~~69~~ ~~70~~ ~~71~~ ~~72~~ ~~73~~ ~~74~~ ~~75~~ ~~76~~ ~~77~~ ~~78~~ ~~79~~ ~~80~~ ~~81~~ ~~82~~ ~~83~~ ~~84~~ ~~85~~ ~~86~~ ~~87~~ ~~88~~ ~~89~~ ~~90~~ ~~91~~ ~~92~~ ~~93~~ ~~94~~ ~~95~~ ~~96~~ ~~97~~ ~~98~~ ~~99~~ ~~100~~ ~~101~~ ~~102~~ ~~103~~ ~~104~~ ~~105~~ ~~106~~ ~~107~~ ~~108~~ ~~109~~ ~~110~~ ~~111~~ ~~112~~ ~~113~~ ~~114~~ ~~115~~ ~~116~~ ~~117~~ ~~118~~ ~~119~~ ~~120~~ ~~121~~ ~~122~~ ~~123~~ ~~124~~ ~~125~~ ~~126~~ ~~127~~ ~~128~~ ~~129~~ ~~130~~ ~~131~~ ~~132~~ ~~133~~ 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DESCRIBE ACT ABUSE OF INFLUENCE Co/Head of ORGANIZED CRIME

FAMIL - ENGAGING IN ORGANIZED CRIME OF TERRORISTIC STYLE include ATTEMPTED MURDER

#51

DEFENDANTS DIANN DUPONT 2840 Hwy 35 JPI

CAPITAL

DESCRIBE ACTS ORGANIZED CRIME TERRORISTIC STYLE Abuse of

Authority/Influence - Theft Estate Attempted Capital Murder

#52

DEFENDANTS DIANE MAGER 2870 Hwy 35 JP2

DESCRIBE ACTS ENGAGING ORGANIZED CRIME, TERRORISTIC STYLE CAPITAL MURDER

Attempt, FALSE IMPRISONMENT - OBSTRUCTION

#53

DEFENDANT STARR B BAUER

DESCRIBE ACTS

#54

DEFENDANT RICHARD BLACK

DESCRIBE ACTS

#55

DEFENDANT PATRICK J FLAMIGAN

DESCRIBE ACTS